

EXHIBIT G

From: [Shannon Gustafson](#)
To: [Hang Le](#)
Cc: [Diana Esquivel](#); [Amy R. Margolies](#); [Anita K. Clarke](#)
Subject: FW: L.C., et al. (Puga) v. State of California
Date: Tuesday, December 17, 2024 5:35:33 PM
Attachments: [2024.12.17 - Letter re Objection to Subpoena \(Los Angeles Police Department\).pdf](#)
[2024.12.17 - Letter re Objection to Subpoena \(Los Angeles Sheriff's Department\).pdf](#)
[2024.12.17 - Letter re Objection to Subpoena \(South Angeles County Sheriff's Department\).pdf](#)
[2024.12.17 - Letter re Objection to Subpoena \(Wasco State Prison\).pdf](#)
[2024.12.17 - Letter re Objection to Subpoena \(CDCR Archives\).pdf](#)
[2024.12.17 - Letter re Objection to Subpoena \(East Angeles County Sheriff's Station\).pdf](#)
[2024.12.17 - Letter re Objection to Subpoena \(LAPD Metropolitan Detention Center\).pdf](#)
[2024.12.17 - Letter re Objection to Subpoena \(Long Beach Police Department\).pdf](#)
[2024.12.17 - Letter re Objection to Subpoena \(Los Angeles County Sheriff's Department Cerritos\).pdf](#)
[2024.12.17 - Letter re Objection to Subpoena \(Los Angeles County Sheriff's Department, Cerritos\).pdf](#)

Hang,

If you intended to send out letters blocking all of our subpoenas so that we are not able to obtain any documents before the discovery cut off, you should have advised the Magistrate this morning when he asked if there were any outstanding issues, instead of waiting until this afternoon so now we have to bring yet another issue to the Court when we know it will be out next week. Further, when do you plan on brining your Motion to Quash, or do you simply plan to let the discovery cut off expire and then claim we are not entitled to the documents?

Setting aside the timing issues above, your Motion to Quash is entirely without merit. If you do not immediately withdraw your letters, we will be filing an Ex Parte seeking an order from the Magistrate to order withdrawal of the same and/or an Ex Parte with Judge Kato to extend the discovery cut off to address this issue by regularly noticed Motion.

First the subpoenas were properly issued pursuant to FRCP 45. Contrary to your false assertions they were not served on the facilities on December 6, 2024. That was the date they were prepared. They were mail served on your office first and then on the custodians in compliance with FRCP 45. This objection is without merit and we will get a declaration from our outside vendor confirming the same if necessary. The subpoenas were procedurally compliant.

Second, Plaintiff's only asserted objection is relevance. Under Rule 45 the grounds for quashing the subpoena are because it requires the disclosure of privileged or protected matter or subjects a person to an undue burden under FRCP 45. There is nothing in FRCP 45 that allows for a Motion to Quash merely because Plaintiff unilaterally has decided the information is not relevant. The standard for discovery under Rule 26 is not whether the information is relevant but whether the request is proportionate to the needs of the case, and here it clearly is for the reasons indicated below. If Plaintiff has an issue with the relevancy of this information or its admissibility at trial, the appropriate time is to raise that in a Motion in Limine and not by obstructing Defendants efforts to gather the information, that Plaintiff has unilaterally deemed not relevant. *United States v. R. Enterprises Inc.* 498 U.S. 292, 301 (1991)(where "a subpoena is challenged on relevancy grounds, the motion to quash must be denied unless the district court determines there is no reasonable possibility that the category of materials . . . will produce information relevant. . .").

Your basis for objecting to these subpoenas and all your authority is based entirely on the argument that records of other incidents that the officers did not know about cannot be relevant to their liability under Section 1983. However, there are many other reasons these records are proportionate to the needs of this case, which is all that is required to issue discovery requests under Rule 26.. Given that Mr. Puga's family have all testified and essentially claimed ignorance of his criminal history , drug history or alcohol history, we were left with no choice but to seek out these records directly from the entities to expose these credibility issues and to introduce evidence of Mr. Puga's lifestyle. So contrary to your claim there is no other means to obtain this information that Puga's mother and girlfriends deny exist.

It cannot be credibly disputed that the quality of the relationship between Puga and his children would be impacted in the future if he were to return to jail, which is the likely result given his past charges and his probation which would now be impacted by his evading of police on February 15-17, 2024. Likewise Puga's past lifestyle is relevant for assessing the quality of his relationships to counter the testimony by Plaintiffs. Finally Puga's medical history, drug history and or injuries sustained in jail may produce information relevant to his life expectancy which is also clearly relevant. Plaintiffs cannot have it both ways, they cannot seek millions of dollars and then block any information related to who Mr. Puga was, and courts have repeatedly so held.

Indisputably, Decedent's life expectancy is at issue in this "wrongful death" case. *See, Francis v. Sauve*, 222 Cal. App. 2d 102, 121 (1963); *see also, Parsons v. Easton*, 184 Cal. 764, 770-771 (1921) ("It is the shorter expectancy of life that is to be taken into consideration [in computing wrongful death damages]; for example; if as in the case here, the expectancy of life of the parents is shorter than that of the son, the benefits to be considered are those only which might accrue during the life of the surviving parents.").

These cases are grounded in the common sense reality that criminal activity presents lifestyle risks that can (and do) impact relationships and life expectancy. *See*, CACI Jury Instruction No. 3921 (wrongful death damages calculations require the jury to evaluate decedent's "**health**, habits, **activities** [and] **lifestyle**....") (emphasis added); *see also, Witkin, Summary of Cal. Law, Wrongful Death*, § 181.17 (10th ed. 2015) ("[E]vidence that [parties' relationship] was strained and unhappy at the time of death may suffice to negate or minimize a surviving [heir's] damages for loss of the decedent's society, comfort, and protection."); *Benwell v. Dean*, 249 Cal.App.2d 345, 353 (1967) ("It is always proper to make proof of the relations of the decedent to the person for whose benefit the action is being maintained, because such proof has a bearing upon the pecuniary loss suffered by the person entitled to recovery . . .").

Introduction of a Decedent's criminal history is also grounded in basic notions of fairness and the recognition that litigation is a search for the truth. *See, Agosto v. Trusswal Systems Corp.*, 142 F.R.D. 118, 120 (E.D. Pa. 1992) ("It is Plaintiff's choice to pursue claims that necessitate the introduction of life expectancy information and basic fairness dictates that Plaintiff should not be allowed to make a potentially large recovery against [the defendant] based on an average life span

when, in reality, Plaintiff may well have a shorter than average life expectancy.”); see also, *Lewis v. District of Columbia*, 793 F.2d 361, 363 (D.C. Cir. 1986) (affirming district court’s order admitting evidence of past drug use and arrests when the evidence was probative in aiding the jury to fairly measure the extent of damages for the alleged police “excessive force” claim and that its prejudicial effect did not substantially outweigh its probative value).

Furthermore, Decedent’s periods of prior incarceration are relevant to Plaintiff’s damages because incarceration would reduce the amount of “society and comfort” Decedent provided to Plaintiffs. *Peraza v. Dalmeter*, 722 F.2d 1455, 1457 (9th Cir. 1984); *Castro v. Cty. of Los Angeles*, No. 2:13-cv-06631, 2015 WL 4694070, at *4 (C.D. Cal. 2015).

Under Rule 26 and FRCP 45, relevancy is not the standard for quashing a subpoena and even if it where the information requested is relevant, and not privileged. Plaintiffs are free to argue the relevancy at trial but there was no valid legal grounds to advise these third parties not to respond to a validly issued subpoena.

Withdraw your letters immediately or we will file an Ex Parte with the Magistrate. I am available tomorrow at 2:00 p.m. to discuss your position but the authority you provided thus far renders your objections frivolous and your obstruction without cause.

Thanks

Shannon L. Gustafson

Shareholder

Direct: (714) 352-3547



1100 W. Town & Country Rd., Suite 1450

Orange, California 92868

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From: Santiago Laurel <slaurel@galipolaw.com>

Sent: Tuesday, December 17, 2024 4:49 PM

To: Diana.Esquivel@doj.ca.gov; Shannon Gustafson <sgustafson@lynberg.com>; Amy R. Margolies <amargolies@lynberg.com>; Gloria Pence <gpence@lynberg.com>

Cc: Hang Le <hlee@galipolaw.com>; Dalekgalipo@yahoo.com

Subject: L.C., et al. (Puga) v. State of California

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Counsel,

Attached please find the following:

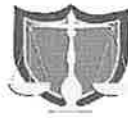
Letter re Objection to Subpoena (CDCR Archives)
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Letter re Objection to Subpoena (East Angeles County Sheriff's Station)
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Letter re Objection to Subpoena (Long Beach Police Department)
Letter re Objection to Subpoena (Los Angeles County Sheriff's Department Cerritos Station)
Letter re Objection to Subpoena (Los Angeles County Sheriff's Department Norwalk Station)
Letter re Objection to Subpoena (Los Angeles Police Department)
Letter re Objection to Subpoena (Los Angeles Sheriff's Department)
Letter re Objection to Subpoena (South Angeles County Sheriff's Station)
Letter re Objection to Subpoena (Wasco State Prison)

Please advise if you have any issues viewing or downloading attachments.

Best regards,
Santiago G. Laurel

Santiago G. Laurel, Litigation Secretary | The Law Offices of Dale K. Galipo | 21800 Burbank Blvd., Suite 310, Woodland Hills, CA 91367 | Office: +1.818.347.3333 | Fax: +1.818.347.4118 |
Email: SLaurel@galipolaw.com

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LAW OFFICES OF
DALE K. GALIPO

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TELEPHONE (818) 347-3333 | FACSIMILE (818) 347-4118 | info@galipolaw.com
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December 17, 2024

VIA U.S. MAIL:

Wasco State Prison
Attn: Custodian of Records
701 Scofield Ave.
Wasco, CA 93280

Subject: Objection to Subpoena re: Hector Javier Puga, DOB: 1/17/89

Dear Custodian of Records,

I am writing to notify you that Plaintiffs L.C., I.H., A.L., and Antonia Salas Ubaldo ("Plaintiffs") object to the December 6, 2024 subpoena issued by the County of San Bernardino to Wasco State Prison:

"Any and all records, medical records, institution records, criminal records, disciplinary records, evaluations, reviews, hearings, court files, and data, including but not limited to admission and release records from this or any other facility, including any and all parole records. CDL: D7320932, CII #: A26588846, FBI#: 611102JC6 pertaining to Hector Javier Puga, DOB: 1/17/89."

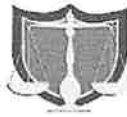
Plaintiffs intend to file a motion to quash or modify the subpoena in the United States District Court for the Central District of California. You are hereby placed on notice that Plaintiffs intend to file such motion. Per Fed. R. Civ. P. 45, you may not release the documents to the deposition officer until permitted by court order to do so. I am also enclosing a copy of the subpoena for your convenience.

If you have any questions, please do not hesitate to contact me by phone or email at hlee@galipolaw.com.

Best Regards,
LAW OFFICES OF DALE K. GALIPO


Hang Le
Attorney for Plaintiffs

cc: (via email only) to:
Kopy Kat, Carrie Page (cpage@kopykat.net)
County Defendants' Counsel – Shannon Gustafson (sgustafson@lynberg.com)
Amy Margolies (amargolies@lynberg.com)
State Defendants' Counsel – Diana Esquivel (Diana.Esquivel@doj.ca.gov)



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December 17, 2024

VIA U.S. MAIL:

South Angeles County Sheriff's Station
Attn: Custodian of Records
1310 W. Imperial Highway
Los Angeles, CA 90044

Subject: Objection to Subpoena re: Hector Javier Puga, DOB: 1/17/89

Dear Custodian of Records,


I am writing to notify you that Plaintiffs L.C., I.H., A.L., and Antonia Salas Ubaldo ("Plaintiffs") object to the December 6, 2024 subpoena issued by the County of San Bernardino to the South Angeles County Sheriff's Station:

"Any and all records, reports, photographs, videos, and statements, including but not limited to: initial reports, supplemental reports, and witness statements. Any and all records, medical records, institution records, criminal records, disciplinary records, evaluations, reviews, hearings, court files, and data including but not limited to admission and release records from this or any other facility, including any and all parole records. CDL: D7320932, CII #: A26588846, FBI#: 611102JC6 pertaining to Hector Javier Puga, DOB: 1/17/89."

Plaintiffs intend to file a motion to quash or modify the subpoena in the United States District Court for the Central District of California. You are hereby placed on notice that Plaintiffs intend to file such motion. Per Fed. R. Civ. P. 45, you may not release the documents to the deposition officer until permitted by court order to do so. I am also enclosing a copy of the subpoena for your convenience.

If you have any questions, please do not hesitate to contact me by phone or email at hlee@galipolaw.com.

Best Regards,
LAW OFFICES OF DALE K. GALIPO


Hang Le
Attorney for Plaintiffs

cc: (via email only) to:

Kopy Kat, Carrie Page (cpage@kopykat.net)

County Defendants' Counsel – Shannon Gustafson (sgustafson@lynberg.com)

Amy Margolies (amargolies@lynberg.com)

State Defendants' Counsel – Diana Esquivel (Diana.Esquivel@doj.ca.gov)



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WWW.GALIPOLAW.COM

December 17, 2024

VIA U.S. MAIL:

Los Angeles Sheriff's Department
Attn: Custodian of Records
211 W. Temple St.
Los Angeles, CA

Subject: Objection to Subpoena re: Hector Javier Puga, DOB: 1/17/89


Dear Custodian of Records,

I am writing to notify you that Plaintiffs L.C., I.H., A.L., and Antonia Salas Ubaldo ("Plaintiffs") object to the December 6, 2024 subpoena issued by the County of San Bernardino to the Los Angeles Sheriff's Department:

"Any and all records, reports, photographs, videos, and statements, including but not limited to: initial reports, supplemental reports, and witness statements. Any and all records, medical records, institution records, criminal records, disciplinary records, evaluations, reviews, hearings, court files, and data including but not limited to admission and release records from this or any other facility, including any and all parole records. CDL: D7320932, CII #: A26588846, FBI#: 611102JC6 pertaining to Hector Javier Puga, DOB: 1/17/89."

Plaintiffs intend to file a motion to quash or modify the subpoena in the United States District Court for the Central District of California. You are hereby placed on notice that Plaintiffs intend to file such motion. Per Fed. R. Civ. P. 45, you may not release the documents to the deposition officer until permitted by court order to do so. I am also enclosing a copy of the subpoena for your convenience.

If you have any questions, please do not hesitate to contact me by phone or email at hlee@dalipolaw.com.

Best Regards,
LAW OFFICES OF DALE K. GALIPO

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Attorney for Plaintiffs

cc: (via email only) to:
Kopy Kat, Carrie Page (cpage@kopykat.net)
County Defendants' Counsel – Shannon Gustafson (sgustafson@lynberg.com)
Amy Margolies (amargolies@lynberg.com)
State Defendants' Counsel – Diana Esquivel (Diana.Esquivel@doj.ca.gov)



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December 17, 2024

VIA U.S. MAIL:

Los Angeles Police Department
Attn: Custodian of Records
200 N. Spring Street
Los Angeles, CA 90012

Subject: Objection to Subpoena re: Hector Javier Puga, DOB: 1/17/89

Dear Custodian of Records,

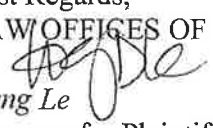
I am writing to notify you that Plaintiffs L.C., I.H., A.L., and Antonia Salas Ubaldo ("Plaintiffs") object to the December 6, 2024 subpoena issued by the County of San Bernardino to the Los Angeles Police Department:

"Any and all records, reports, photographs, videos, and statements, including but not limited to: initial reports, supplemental reports, and witness statements. Any and all records, medical records, institution records, criminal records, disciplinary records, evaluations, reviews, hearings, court files, and data, including but not limited to admission and release records from this or any other facility, including any and all parole records. CDL: D7320932, CII #: A26588846, FBI#: 611102JC6 pertaining to Hector Javier Puga, DOB: 1/17/89."

Plaintiffs intend to file a motion to quash or modify the subpoena in the United States District Court for the Central District of California. You are hereby placed on notice that Plaintiffs intend to file such motion. Per Fed. R. Civ. P. 45, you may not release the documents to the deposition officer until permitted by court order to do so. I am also enclosing a copy of the subpoena for your convenience.

If you have any questions, please do not hesitate to contact me by phone or email at hlee@galipolaw.com.

Best Regards,
LAW OFFICES OF DALE K. GALIPO


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Attorney for Plaintiffs

cc: (via email only) to:
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County Defendants' Counsel – Shannon Gustafson (sgustafson@lynberg.com)
Amy Margolies (amargolies@lynberg.com)
State Defendants' Counsel – Diana Esquivel (Diana.Esquivel@doj.ca.gov)



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December 17, 2024

VIA U.S. MAIL:

Los Angeles County Sheriff's Department,
Norwalk Sheriff Station
Attn: Custodian of Records
12335 Civic Center Dr.
Norwalk, CA 90650

Subject: Objection to Subpoena re: Hector Javier Puga, DOB: 1/17/89


Dear Custodian of Records,

I am writing to notify you that Plaintiffs L.C., I.H., A.L., and Antonia Salas Ubaldo ("Plaintiffs") object to the December 6, 2024 subpoena issued by the County of San Bernardino to the Norwalk Sheriff Station:

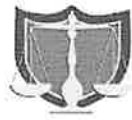
"Any and all records, reports, photographs, videos, and statements, including but not limited to: initial reports, supplemental reports, and witness statements. Any and all records, medical records, institution records, criminal records, disciplinary records, evaluations, reviews, hearings, court files, and data including but not limited to admission and release records from this or any other facility, including any and all parole records. CDL: D7320932, CII #: A26588846, FBI#: 611102JC6 pertaining to Hector Javier Puga, DOB: 1/17/89."

Plaintiffs intend to file a motion to quash or modify the subpoena in the United States District Court for the Central District of California. You are hereby placed on notice that Plaintiffs intend to file such motion. Per Fed. R. Civ. P. 45, you may not release the documents to the deposition officer until permitted by court order to do so. I am also enclosing a copy of the subpoena for your convenience.

If you have any questions, please do not hesitate to contact me by phone or email at hlee@galipolaw.com.

Best Regards,
LAW OFFICES OF DALE K. GALIPO

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Attorney for Plaintiffs

cc: (via email only) to:
Kopy Kat, Carrie Page (cpage@kopykat.net)
County Defendants' Counsel – Shannon Gustafson (sgustafson@lynberg.com)
Amy Margolies (amargolies@lynberg.com)
State Defendants' Counsel – Diana Esquivel (Diana.Esquivel@doj.ca.gov)



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WWW.GALIPOLAW.COM

December 17, 2024

VIA U.S. MAIL:

Los Angeles County Sheriff's Department
Cerritos Sheriff Station
Attn: Custodian of Records 18135 Bloomfield Ave.
Cerritos, CA 90703

Subject: Objection to Subpoena re: Hector Javier Puga, DOB: 1/17/89

Dear Custodian of Records,


I am writing to notify you that Plaintiffs L.C., I.H., A.L., and Antonia Salas Ubaldo ("Plaintiffs") object to the December 6, 2024 subpoena issued by the County of San Bernardino to the Cerritos Sheriff Station:

"Any and all records, reports, photographs, videos, and statements, including but not limited to: initial reports, supplemental reports, and witness statements. Any and all records, medical records, institution records, criminal records, disciplinary records, evaluations, reviews, hearings, court files, and data including but not limited to admission and release records from this or any other facility, including any and all parole records. CDL: D7320932, CII #: A26588846, FBI#: 611102JC6 pertaining to Hector Javier Puga, DOB: 1/17/89."

Plaintiffs intend to file a motion to quash or modify the subpoena in the United States District Court for the Central District of California. You are hereby placed on notice that Plaintiffs intend to file such motion. Per Fed. R. Civ. P. 45, you may not release the documents to the deposition officer until permitted by court order to do so. I am also enclosing a copy of the subpoena for your convenience.

If you have any questions, please do not hesitate to contact me by phone or email at hlee@galipolaw.com.

Best Regards,
LAW OFFICES OF DALE K. GALIPO


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Attorney for Plaintiffs

cc: (via email only) to:
Kopy Kat, Carrie Page (epage@kopykat.net)
County Defendants' Counsel – Shannon Gustafson (sgustafson@lynberg.com)
Amy Margolies (amargolies@lynberg.com)
State Defendants' Counsel – Diana Esquivel (Diana.Esquivel@doj.ca.gov)



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TELEPHONE (818) 347-3333 | FACSIMILE (818) 347-4118 | info@galipolaw.com
WWW.GALIPOLAW.COM

December 17, 2024

VIA U.S. MAIL:

Long Beach Police Department
Attn: Custodian of Records
400 Broadway
Long Beach, CA

Subject: Objection to Subpoena re: Hector Javier Puga, DOB: 1/17/89

Dear Custodian of Records,


I am writing to notify you that Plaintiffs L.C., I.H., A.L., and Antonia Salas Ubaldo ("Plaintiffs") object to the December 6, 2024 subpoena issued by the County of San Bernardino to the Long Beach Police Department:

"Any and all records, reports, photographs, videos, and statements, including but not limited to: initial reports, supplemental reports, and witness statements. Any and all records, medical records, institution records, criminal records, disciplinary records, evaluations, reviews, hearings, court files, and data, including but not limited to admission and release records from this or any other facility, including any and all parole records. CDL: D7320932, CII #: A26588846, FBI#: 611102JC6 pertaining to Hector Javier Puga, DOB: 1/17/89."

Plaintiffs intend to file a motion to quash or modify the subpoena in the United States District Court for the Central District of California. You are hereby placed on notice that Plaintiffs intend to file such motion. Per Fed. R. Civ. P. 45, you may not release the documents to the deposition officer until permitted by court order to do so. I am also enclosing a copy of the subpoena for your convenience.

If you have any questions, please do not hesitate to contact me by phone or email at hlee@galipolaw.com.

Best Regards,
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Attorney for Plaintiffs

cc: (via email only) to:
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County Defendants' Counsel – Shannon Gustafson (sgustafson@lynberg.com)
Amy Margolies (amargolies@lynberg.com)
State Defendants' Counsel – Diana Esquivel (Diana.Esquivel@doj.ca.gov)



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DALE K. GALIPO

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TELEPHONE (818) 347-3333 | FACSIMILE (818) 347-4118 | info@galipolaw.com
WWW.GALIPOLAW.COM

December 17, 2024

VIA U.S. MAIL:

LAPD Metropolitan Detention Center
Attn: Custodian of Records
180 N. Los Angeles Street
Los Angeles, CA 90012

Subject: Objection to Subpoena re: Hector Javier Puga, DOB: 1/17/89

Dear Custodian of Records,


I am writing to notify you that Plaintiffs L.C., I.H., A.L., and Antonia Salas Ubaldo ("Plaintiffs") object to the December 6, 2024 subpoena issued by the County of San Bernardino to the East Angeles County Sheriff's Station:

"Any and all records, reports, photographs, videos, and statements, including but not limited to: initial reports, supplemental reports, and witness statements. Any and all records, medical records, institution records, criminal records, disciplinary records, evaluations, reviews, hearings, court files, and data, including but not limited to admission and release records from this or any other facility, including any and all parole records. CDL: D7320932, CII #: A26588846, FBI#: 611102JC6 pertaining to Hector Javier Puga, DOB: 1/17/89."

Plaintiffs intend to file a motion to quash or modify the subpoena in the United States District Court for the Central District of California. You are hereby placed on notice that Plaintiffs intend to file such motion. Per Fed. R. Civ. P. 45, you may not release the documents to the deposition officer until permitted by court order to do so. I am also enclosing a copy of the subpoena for your convenience.

If you have any questions, please do not hesitate to contact me by phone or email at hlee@galipolaw.com.

Best Regards,
LAW OFFICES OF DALE K. GALIPO


Hang Le
Attorney for Plaintiffs

cc: (via email only) to:

Kopy Kat, Carrie Page (cpage@kopykat.net)

County Defendants' Counsel – Shannon Gustafson (sgustafson@lynberg.com)

Amy Margolies (amargolies@lynberg.com)

State Defendants' Counsel – Diana Esquivel (Diana.Esquivel@doj.ca.gov)



LAW OFFICES OF
DALE K. GALIPO

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WWW.GALIPOLAW.COM

December 17, 2024

VIA U.S. MAIL:

East Angeles County Sheriff's Station
Attn: Custodian of Records
5019 E. Third Street
Los Angeles, CA 90022

Subject: Objection to Subpoena re: Hector Javier Puga, DOB: 1/17/89


Dear Custodian of Records,

I am writing to notify you that Plaintiffs L.C., I.H., A.L., and Antonia Salas Ubaldo ("Plaintiffs") object to the December 6, 2024 subpoena issued by the County of San Bernardino to the East Angeles County Sheriff's Station:

"Any and all records, reports, photographs, videos, and statements, including but not limited to: initial reports, supplemental reports, and witness statements. Any and all records, medical records, institution records, criminal records, disciplinary records, evaluations, reviews, hearings, court files, and data, including but not limited to admission and release records from this or any other facility, including any and all parole records. CDL: D7320932, CII #: A26588846, FBI#: 611102JC6 pertaining to Hector Javier Puga, DOB: 1/17/89."

Plaintiffs intend to file a motion to quash or modify the subpoena in the United States District Court for the Central District of California. You are hereby placed on notice that Plaintiffs intend to file such motion. Per Fed. R. Civ. P. 45, you may not release the documents to the deposition officer until permitted by court order to do so. I am also enclosing a copy of the subpoena for your convenience.

If you have any questions, please do not hesitate to contact me by phone or email at hlee@galipolaw.com.

Best Regards,
LAW OFFICES OF DALE K. GALIPO

Hang Le
Attorney for Plaintiffs

cc: (via email only) to:
Kopy Kat, Carrie Page (cpage@kopykat.net)
County Defendants' Counsel – Shannon Gustafson (sgustafson@lynberg.com)
Amy Margolies (amargolies@lynberg.com)
State Defendants' Counsel – Diana Esquivel (Diana.Esquivel@doj.ca.gov)



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December 17, 2024

VIA U.S. MAIL:

CDCR Archives
Attn: Custodian of Records
2015 Aerojet Rd. #D
Rancho Cordova, CA 95742

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